



REDACTED – FOR PUBLIC INSPECTION

June 30, 2015

Pacific Guardian Center

Makai Tower

733 Bishop Street

Suite 1200

Honolulu, HI 96813

www.mobipcs.com

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

Re: FCC Form 481 – Carrier Annual Report for Program Year 2016
WC Docket No. 10-90 and WC Docket No. 14-58

Dear Secretary Dortch:

On behalf of Coral Wireless LLC, d/b/a Mobi PCS ("Mobi"), Study Area Code (SAC) 629002, please find attached a public version of Mobi's FCC Form 481 Carrier Annual Report, filed pursuant to Sections 54.313 and 54.422 of the Commission's Rules ("Form 481 Report").

This filing was electronically submitted to the Universal Service Administrative Company and is being filed with the FCC per instructions for filing Form 481.

Copies of this filing have also been provided to the Hawaii Public Utilities Commission, the Hawaii Division of Consumer Advocacy, the Department of Hawaiian Home Lands, and the Office of Hawaiian Affairs.

Mobi is also submitting to the Commission, under separate cover, a confidential version of the Form 481 Report. The confidential version is marked "CONFIDENTIAL – NOT FOR PUBLIC INSPECTION." For each report with a corresponding confidential version, the attached Form 481 Report has been marked "REDACTED – FOR PUBLIC INSPECTION."

Please contact the undersigned at (808) 723-2072 if any questions arise concerning the above-referenced enclosures or if you require any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Woelfel".

Mark Woelfel
Chief Financial Officer

Attachment

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	629002
<015> Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Peter Gose
<035> Contact Telephone Number: Number of the person identified in data line <030>	8087232072 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	peter.gose@mobipcs.com

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed		<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile		<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 629002HI510 - 2016PY.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 629002HI610 - 2016PY.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<110>	Has your company received its ETC certification from the FCC?	<input checked="" type="radio"/>	(yes / no)
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/>	(yes / no)

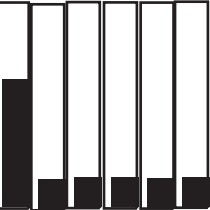
If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.



- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contract Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobilpcs.com

[illegible]

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0985/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobicps.com

1/1/2015
35.0

	Residential Local Service Charge Effective Date	Single State-wide Residential Local Service Charge
<701>		
<702>		

[illegible]

[illegible]

**(800) Operating Companies
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext..
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com
<810>	Reporting Carrier	Coral Wireless DBA Mobi PCS
<811>	Holding Company	Coral Wireless Holding LLC
<812>	Operating Company	Coral Wireless DBA Mobi PCS

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobilpcs.com

Hawaiian Home Lands

629002HI920 - 2016FY .pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.3.13(a)(9) includes:

[illegible]

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div></div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	www.http://mobipcs.com/services/lifeline

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation		FCC Form 481	
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013	

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobilpcs.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)i}	
<2011a>	3rd Year Certification {47 CFR § 54.313(b)(1)ii}	
<2011b>	Attachment {47 CFR § 54.313(b)(1)ii}	

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

<2012>	2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}	
<2013>	2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}	
<2014>	2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}	
<2015>	2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}	

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016>	Certification Support Used to Build Broadband	
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Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017>	3rd year Broadband Service Certification	
<2018>	5th year Broadband Service Certification	
<2019>	Interim Progress Certification	
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	
<2021>	Interim Progress Community Anchor Institutions	

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobicps.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) **Progress Report on 5 Year Plan**
Milestone Certification (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(3014) If yes, does your company file the RUS annual report

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

Name of Attached Document Listing Required Information (Yes/No) (Yes/No)

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

(3018) If the response is no on line 3014, Is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

Name of Attached Document Listing Required Information

(3026) Attach the worksheet listing required information

<010>	Study Area Code	629002
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<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

Financial Data Summary

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service(TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	629002
<015>	Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Peter Gose
<035>	Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: CORAL WIRELESS DBA MOBI PCS	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2015
Printed name of Authorized Officer: Mark Woelfel	
Title or position of Authorized Officer: Chief Financial Officer	
Telephone number of Authorized Officer: 8087232067 ext.	
Study Area Code of Reporting Carrier: 629002	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	629002
<015> Study Area Name	CORAL WIRELESS DBA MOBI PCS
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Peter Gose
<035> Contact Telephone Number - Number of person identified in data line <030>	8087232072 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	peter.gose@mobipcs.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)	
)	
CORAL WIRELESS, LLC d/b/a MOBI PCS)	WC Docket No. 10-90
)	
To be Designated by the Commission as an)	
Eligible Telecommunications Carrier)	

**PROGRAM YEAR 2016 ANNUAL DATA COLLECTION
REPORT OF CORAL WIRELESS, LLC d/b/a MOBI PCS**

**DULY DESIGNATED AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER BY THE
PUBLIC UTILITIES COMMISSION OF
THE STATE OF HAWAII**

**UPDATE TO PREVIOUSLY FILED FIVE-YEAR SERVICE
QUALITY IMPROVEMENT PLAN**

**CONFIDENTIAL TREATMENT IS TO BE ACCORDED
PROPRIETARY SECTIONS OF THIS REPORT**

I. INTRODUCTION

Coral Wireless, LLC d/b/a Mobi PCS (hereinafter “Mobi PCS” or “Mobi”) submits this update to its previously submitted Five-Year Service Quality Improvement Plan in WC Docket No. 10-90 in fulfillment of FCC rules. As an eligible telecommunications carrier (“ETC”) certified by the Public Utilities Commission of the State of Hawaii (“HPUC”) Mobi submits service quality improvement plans to the HPUC. Those plans focus of the past and current year and also included a forecast of one year forward. Mobi hereby provides this annual update to the aforementioned service quality improvement plan document with the recognition that in 2016 all high cost support will entirely be phased out for Mobi. This submission includes maps explaining Mobi’s progress on service expansion, the amount of universal service support received and expected to be received, and how the support was and will be used to improve service quality, coverage, or capacity, and an explanation regarding network improvement targets that were realigned in the prior calendar year.

II. BACKGROUND AND REQUIRED INFORMATION

ETCs receiving high-cost support for voice telephony service and offering broadband as a condition of such support, must file with the Commission, relevant state commission, or Tribal government, as appropriate, a five-year build-out plan that accounts for the new broadband obligations adopted in the *USF/ICC Transformation Order*, in a manner consistent with section 54.202(a)(1)(ii). Section 54.313(a)(1) requires such ETCs to file annual progress reports on their five-year build-out plans in subsequent years. Competitive ETCs such as Mobi whose support is being phased down are not necessarily required to submit a new five-year build-out plan but must continue to submit information or certifications with respect to their provision of voice service, including filing progress reports on any previously filed five-year build-out plans. This annual update sets forth Mobi’s progress towards service expansion, the amount of universal service support received, how the support was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that were not fulfilled but realigned in the prior calendar year. The information submitted describes improvements that benefit the entire serving area, hence a system wide designation is set forth.

III. SERVICE QUALITY IMPROVEMENT PLAN

The projects described in this service quality improvement plan have been selected on the basis of current Universal Service Fund reforms, consumer demand, projected customer growth and consumer feedback respecting network coverage areas. Changes to the structure or operation of the Universal Service Fund have substantial bearing on Mobi's planned service improvements. On November 18, 2011, the Federal Communications Commission released its Report & Order & Further Notice of Proposed Rulemaking outlining its universal service reforms. *In re Connect America Fund*, WC Docket No. 10-90, Report & Order & FNRPM, FCC 11-161 (rel. Nov. 18, 2011) ("*FUSF Order*"). Among other things, the *FUSF Order* imposed a host of changes to the calculation of High Cost Program support for CETCs. The FCC further clarified in a subsequent February 2012 Order CETCs that USF support for CETCs would be determined on an incumbent local exchange carrier study area basis. As a result of the *FUSF Order* and the subsequent Clarification Order, a substantial reduction in available USF support for all CETCs in Hawaii has already been implemented. The amount of support received or anticipated to be received by Mobi and the eligible expenditures from 2012 until the phase out of the legacy High Cost Support program in 2016 appear in the table below:

[BEGIN CONFIDENTIAL]



2016 Program Year: Annual Data Collection Report of Coral Wireless, LLC d/b/a Mobi PCS

[REDACTED]

[REDACTED]

[REDACTED]

2016 Program Year: Annual Data Collection Report of Coral Wireless, LLC d/b/a Mobi PCS

[REDACTED]

[REDACTED]

[REDACTED]

2016 Program Year: Annual Data Collection Report of Coral Wireless, LLC d/b/a Mobi PCS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[END CONFIDENTIAL]

2016 PROGRAM YEAR: ANNUAL DATA COLLECTION: FIVE-YEAR PLAN

HIGHLY CONFIDENTIAL

[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

2016 REPRESENTS THE FINAL PROGRAM YEAR AS THE HIGH COST PROGRAM SHALL BE PHASED OUT FOR COMPETITIVE ELIGIBLE TELECOMMUNICATIONS CARRIERS AT Q3 2016.

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)	
)	
CORAL WIRELESS, LLC d/b/a MOBI PCS)	WC Docket No. 10-90
)	
To be Designated by the Commission as an)	
Eligible Telecommunications Carrier)	

**PROGRAM YEAR 2016 ANNUAL DATA COLLECTION
REPORT OF CORAL WIRELESS, LLC d/b/a MOBI PCS**

**DULY DESIGNATED AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER BY THE
PUBLIC UTILITIES COMMISSION OF
THE STATE OF HAWAII**

**SERVICE QUALITY STANDARDS AND
CONSUMER PROTECTION RULES COMPLIANCE**

**CONFIDENTIAL TREATMENT IS TO BE ACCORDED
PROPRIETARY SECTIONS OF THIS REPORT**

2016 Program Year: Annual Data Collection Report of Coral Wireless, LLC d/b/a Mobi PCS

Coral Wireless, LLC d/b/a Mobi PCS (hereinafter “Mobi PCS” or “Mobi”) adheres to the CTIA Code for Wireless service to ensure high levels of service quality and consumer protection. Specifically Mobi PCS at all times will [1] Disclose rates and terms of service to consumers; [2] Make available maps showing where service is generally available; [3] Provide contract terms to customers and confirm changes in service; [4] Allow a trial period for new service; [5] Provide specific disclosures in advertising; [6] Separately identify carrier charges from taxes on billing statements; [7] Provide customers the right to terminate service for changes to contract terms; [8] Provide ready access to customer service; [9] Promptly respond to consumer inquiries and complaints received from government agencies; [10] Abide by policies for protection of customer privacy; [11] Provide consumers with free notifications for voice, data and messaging usage, and international roaming; [12] Abide by CTIA standards regarding the ability of customers, former customers, and individual owners of eligible devices to unlock phones and tablets that are locked by or at the direction of the carrier.

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)	
)	
CORAL WIRELESS, LLC d/b/a MOBI PCS)	WC Docket No. 10-90
)	
To be Designated by the Commission as an)	
Eligible Telecommunications Carrier)	

**PROGRAM YEAR 2016 ANNUAL DATA COLLECTION
REPORT OF CORAL WIRELESS, LLC d/b/a MOBI PCS**

**DULY DESIGNATED AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER BY THE
PUBLIC UTILITIES COMMISSION OF
THE STATE OF HAWAII**

EMERGENCY FUNCTIONALITY

**CONFIDENTIAL TREATMENT IS TO BE ACCORDED
PROPRIETARY SECTIONS OF THIS REPORT**

2016 Program Year: Annual Data Collection Report of Coral Wireless, LLC d/b/a Mobi PCS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2016 Program Year: Annual Data Collection Report of Coral Wireless, LLC d/b/a Mobi PCS

[REDACTED]

[REDACTED]

REPORT ON 2014 ANNUAL TRIBAL ENGAGEMENT BETWEEN CORAL WIRELESS, LLC d/b/a MOBI PCS AND THE OFFICE OF HAWAIIAN AFFAIRS

INTRODUCTION

Pursuant to required obligations for Tribal engagement as set forth in the USF Transformation Order¹, Coral Wireless, LLC d/b/a Mobi PCS ("Mobi") and the Office of Hawaiian Affairs ("OHA") held the 2014 annual engagement meeting on April 7, 2015, at the OHA headquarters office at 560 N. Nimitz Highway in Honolulu, Hawaii. As a framework to guide the engagement meeting, Mobi and OHA generally followed the Federal Communications Commission ("FCC") Office of Native Affairs and Policy ("ONAP") Further Guidance document for tribal government engagement. The ONAP Further Guidance document recommends best practices for recordkeeping² and as such Mobi and OHA have agreed to memorialize the event sequence leading up to the engagement meeting and the key topics discussed during the engagement meeting. From time to time this recordkeeping document will be appended to as Mobi and OHA exchange reports, information, and ideas.

MEETING SUMMARY

Mobi PCS was represented by Philip Risken, Peter Gose, Jeff Napoleon and Erica Villanueva. OHA was represented by Kai Markell and Jerry Norris. Introductions were made and Mobi described goals for the engagement meeting. Both Mobi and the OHA expressed belief that the engagement meeting would be mutually beneficial.

Mobi prepared and presented a PowerPoint presentation.

Prior to the meeting Peter Gose circulated copies of a presentation and the ONAP Further Guidance document to the OHA participants. Mobi noted that its presentation followed the general constructs of the Further Guidance document.

Mobi described how the engagement meeting process has been integrated into the annual reporting process for ETCs. Mobi gave a history of the evolution of the Universal Service Fund ("USF").

Mobi stressed its desire to work with the OHA in the future as network expansion needs arise. OHA mentioned that future partnerships may be possible given new land holdings under control of OHA and potential changes possible under changes to DHHL funding mechanisms.

Mobi presented information about the company and the services Mobi provides.

Mobi discussed its rate plan structures, features, and pricing, including Lifeline and Po'okela programs.

Mobi and OHA discussed communications goals, needs and priorities.

Mobi discussed its prioritization process and focused on both current and future service deployments.

¹ See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC 17663 at 17668-69, para. 637 (2011) (*USF/ICC Transformation Order*);

²Tribal Nations also should immediately begin preparations to receive, record, and process this engagement dialogue and any related correspondence. Specific efforts should be made to chronicle details of engagement dialogue sessions. Recordkeeping should be established for documentation of the initial contact, any follow-up communications, and the resulting annual certification documentation. Records should include, for example, a summary of all verbal interactions as well as copies of all electronic and hard copy communications. Paragraph 13.

REPORT ON 2014 ANNUAL TRIBAL ENGAGEMENT BETWEEN CORAL WIRELESS, LLC d/b/a MOBI PCS AND THE OFFICE OF HAWAIIAN AFFAIRS

Mobi and OHA discussed planning for feasibility and sustainability of communications services for HHL communities.

Mobi and OHA discussed Mobi's marketing to HHL residents.

Mobi and OHA discussed rights of way and permitting issues as they might relate to Mobi's placement of infrastructure.

Mobi discussed its business licensing requirements from a federal, state, regulatory, and local perspective.

Mobi asked the OHA staff how Mobi can assist with HHL community needs from the perspective of anchor institutions, economic development, education, health care and public safety. Discussion followed.

OHA reiterated an interest in the expansion of Mobi's Po'okela program to native Hawaiians who are on the waiting list. Mobi committed to share that request with its senior leadership.

REPORT ON 2014 ANNUAL TRIBAL ENGAGEMENT BETWEEN CORAL WIRELESS, LLC d/b/a MOBI PCS AND THE DEPARTMENT OF HAWAIIAN HOME LANDS

INTRODUCTION

Pursuant to required obligations for Tribal engagement as set forth in the USF Transformation Order¹, Coral Wireless, LLC d/b/a Mobi PCS ("Mobi") and the Department of Hawaiian Home Lands ("DHHL") held the 2014 annual engagement meeting on Tuesday, April 29, 2015 at the DHHL headquarters office Kapolei, Hawaii. As a framework to guide the engagement meeting, Mobi and DHHL generally followed the Federal Communications Commission ("FCC") Office of Native Affairs and Policy ("ONAP") Further Guidance document for tribal government engagement. The ONAP Further Guidance document recommends best practices for recordkeeping² and as such Mobi and DHHL have agreed to memorialize the event sequence leading up to the engagement meeting and the key topics discussed during the engagement meeting. From time to time this recordkeeping document will be appended to as Mobi and DHHL exchange reports, information, and ideas.

MEETING SUMMARY

Mobi PCS was represented by Philip Risken, Peter Gose, and Jeff Napoleon.. DHHL was represented by Linda Chinn, Kamanao Mills, and Shelly Carreira. Introductions were made and Mobi described goals for the engagement meeting. Both Mobi and the DHHL expressed belief that the engagement meeting would be mutually beneficial. Linda Chinn informed Mobi that she would soon be retiring and that future correspondence and coordination should take place through Shelly Carreira.

Mobi prepared and presented a PowerPoint presentation.

Prior to the meeting Peter Gose circulated copies of a presentation and the ONAP Further Guidance document to the DHHL participants. Mobi noted that its presentation followed the general constructs of the Further Guidance document.

Mobi described how the engagement meeting process has been integrated into the annual reporting process for ETCs. Mobi gave a history of the evolution of the Universal Service Fund ("USF").

Mobi stressed its desire to work with the DHHL in the future as network expansion needs arise. DHHL mentioned that future partnerships may be possible given new land holdings under control of DHHL and potential changes possible under changes to DHHL funding mechanisms.

Mobi presented information about the company and the services Mobi provides.

Mobi discussed its rate plan structures, features, and pricing, including Lifeline and Po'okela programs.

Mobi and DHHL discussed communications goals, needs and priorities.

Mobi discussed its prioritization process and focused on both current and future service deployments.

¹ See *Connect America Fund*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC 17663 at 17668-69, para. 637 (2011) (*USF/ICC Transformation Order*);

²Tribal Nations also should immediately begin preparations to receive, record, and process this engagement dialogue and any related correspondence. Specific efforts should be made to chronicle details of engagement dialogue sessions. Recordkeeping should be established for documentation of the initial contact, any follow-up communications, and the resulting annual certification documentation. Records should include, for example, a summary of all verbal interactions as well as copies of all electronic and hard copy communications. Paragraph 13.

REPORT ON 2014 ANNUAL TRIBAL ENGAGEMENT BETWEEN CORAL WIRELESS, LLC d/b/a MOBI PCS AND THE DEPARTMENT OF HAWAIIAN HOME LANDS

Mobi and DHHL discussed planning for feasibility and sustainability of communications services for HHL communities.

Mobi and DHHL discussed Mobi's marketing to HHL residents.

Mobi and DHHL discussed rights of way and permitting issues as they might relate to Mobi's placement of infrastructure.

Mobi discussed its business licensing requirements from a federal, state, regulatory, and local perspective.

Mobi asked the DHHL staff how Mobi can assist with HHL community needs from the perspective of anchor institutions, economic development, education, health care and public safety. Discussion followed.

DHHL reiterated an interest in the expansion of Mobi's Po'okela program to native Hawaiians who are on the waiting list. Mobi committed to share that request with its senior leadership. DHHL provided information on improved methods for authenticating residency of DHHL leaseholders.